

OIL CONSERVATION DIVISION
AZTEC DISTRICT OFFICE
1000 RIO BRAZOS ROAD
AZTEC NM 87410
(505) 334-6178 FAX: (505) 334-6170
http://emnrd.state.nm.us/ocd/District III/3distric.htm

GARY E. JOHNSON Governor

Jennifer A. Salisbury Cabinet Secretary

June 11, 1999

Ms Kay Maddox Conoco, Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500

Re:

Nickson #16, O-35-26N-08W, API # 30-045-20183

Application For Tubingless Exception To Rule 107

Dear Ms Maddox:

Your request to pull tubing in the referenced well and install a casing plunger is hereby granted. This action may produce gas and lift oil and water more efficiently that could result in the recovery of additional reserves. If the plunger is removed after installation, tubing must be re-run before the well is allowed to produce.

If you have any questions, please contact this office.

Yours truly,

Ernie Busch

District Geologist/Deputy O&G Inspector

EB/mk

Xc:

Roy Johnson-Santa Fe

Well File

Ernie Busel

NICKJON#16-1121



Mid-Continent Region Exploration/Production Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400

OIL COM. DIV.

May 25, 1999

Mr. Ernie Busch New Mexico Oil Conservation Division – Aztec District Office 1000 Rio Brazos Road Aztec. New Mexico 87410

RE:

Application for Tubingless Exception to Rule 107

San Juan 28-7 # 186 API # 30-039-20644 Section 13, T-28-N, R-7-W, K

Nickson # 13 API # 30-045-20168 Section 26, T-26-N, R-8-W, M

Nickson # 16 API # 30-045-20183 Section 35, T-26-N, R-8-W, O

Dear Mr. Busch,

An exception to Rule 107, requiring the above listed wells to be produced with tubing, is requested. It is believed that producing the well tubingless will increase the producing rate efficiency and maximize recovery from this well. The purpose for removing the tubing from this well is to allow the use of the new innovative casing plunger that allows continuos gas flow while at the same time automatically lifting produced oil and water volumes.

Whereas requests and application for tubingless completions have typically been for newer, high rate gas wells in an effort to reduce the flow restrictions of tubing, these three wells are marginal low rate producers whose production has been restricted by fluid loading. Due to overloading and downtime the referenced wells are not producing at their maximum ability.

The discovery of the new innovative casing plunger seems to offer a more efficient producing solution. Conoco, Inc. was granted permission to use this tool on the Ohio #1 By Order TX 278 dated 12/15/97. This new innovative approach (to the San Juan) for increasing the producing efficiency and ultimate recovery of mature depleted gas wells has been extremely successful as evidenced in the Ohio #1.



Mid-Continent Region Exploration/Production Conoco Inc. 10 Desta Drive, Suite 100W Midland, TX 79705-4500 (915) 686-5400

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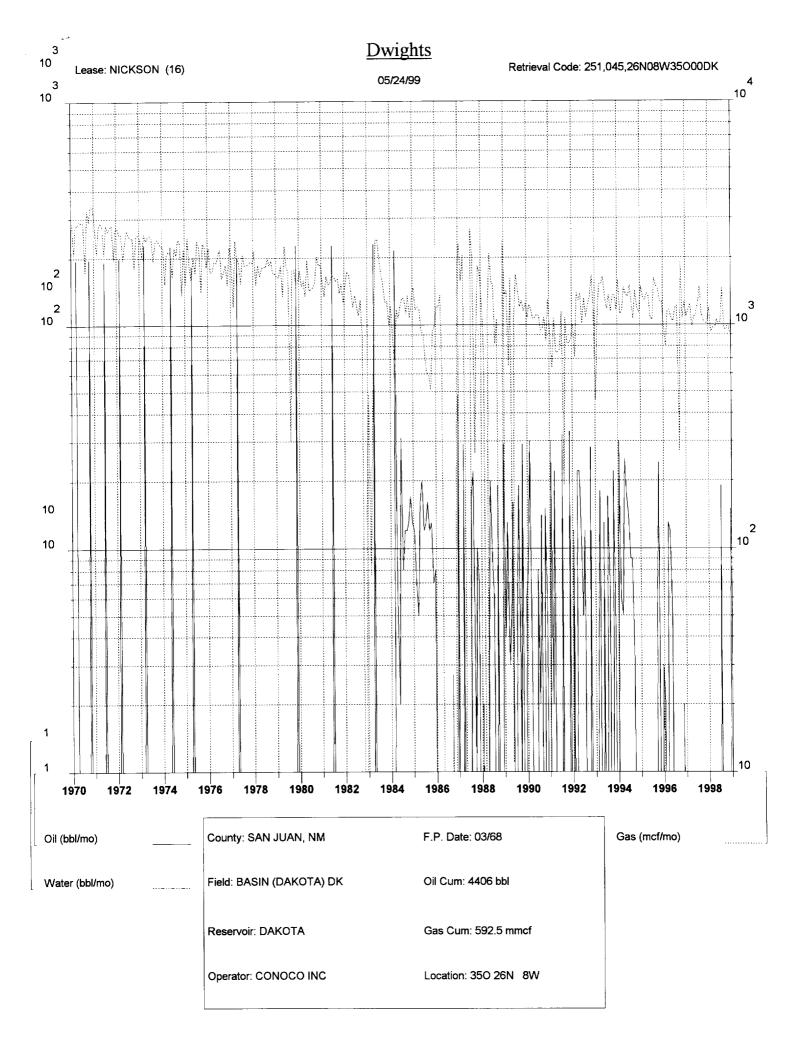
To configure the wellbores for use with the casing plungers the production tubing will be removed and the casing pressure tested for leaks and drift. A casing scraper will be used to clean out the interior casing surface and then re-pressure tested. A downhole collar stop and casing plunger catcher will be installed in the first collar above the top perforation (refer to wellbore schematic). At the surface, the wellhead will be configured with a plunger catcher and a bypass with an automated controller. The plunger is automatically dropped when a fluid loading problem is detected by the surface controller while allowing continuous gas flow through its internal bypass valve.

Conoco, Inc. requests that they be granted an exception to Rule 107 for the above referenced wells to continue this tubingless operation to fully optimize and economically produce the three mature and depleted Dakota gas wells. If there are additional questions regarding this application please call me at (915) 686-5798.

Sincerely yours,

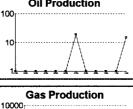
Kay Maddox

Regulatory Agent - Conoco, Inc.



Lease: Field:	NICKSON "BASIN (DAKOTA) [OK .	Well #: Location:	16 350 26N 8W	FP Date: LP Date:	68-03 98-12	
	: CONOCO INC		Liquid Cum:	4,406 bbls	Liq Since:	FPDATE FPDATE	
RCI#: API#:	251,045,26N08W35 30-045-20183-00	6000DK	Gas Cum: Status:	592,479 mcf ACT GAS	Gas Since:		
DATE	OIL, BBLs	GAS, MCF	WATER, BBLs	WELLS	Oil Production	1	
1/1998	0	1,187	0	1	100		
0/4000	0	024	0	4	l .		

WELLS	WATER, BBLs	GAS, MCF	OIL, BBLs	DATE
1	0	1,187	0	01/1998
1	0	924	0	02/1998
1	0	974	0	03/1998
1	0	959	0	04/1998
1	0	1,061	0	05/1998
1	0	998	0	06/1998
1	0	1,016	19	07/1998
1	0	1,465	0	08/1998
1	0	967	0	09/1998
1	0	940	0	10/1998
1	0	1,006	0	11/1998
1	0	918	15	12/1998
	0	12,415	34	Total



NICKSON 16 (GMH 2/11/97)

